

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO: <i>Tina Harris, et al. v. Ethicon, Inc., et al</i> <i>Civil Action No. 2:12-cv-03246</i>	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
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**PLAINTIFFS' DESIGNATION AND DISCLOSURE OF
CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 210, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned civil action (“Plaintiffs”) submit the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiffs’ case pursuant to Rule 702 of the Federal Rules of Evidence. Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of all witnesses designated or identified by Plaintiffs or Defendants as an expert or person with specialized knowledge, training, or experience.

- 1) Dr. Konstantin Walmsley (Urologist)
777 Bloomfield Avenue
Glen Ridge, New Jersey 07028

Plaintiff refers Defendants to Dr. Walmsley’s Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Walmsley’s Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Walmsley, the exhibits that Dr. Walmsley may use to support his opinions, and Dr. Walmsley’s qualifications,

publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Walmsley's Expert Reports and all subparts and attachments thereto.

- 2) Dr. Jerry Blaivas (Urologist)
445 East 77th Street
New York, NY 10075
(212) 772-3900

Plaintiffs refer Defendants to Dr. Blaivas' Expert Reports regarding the TVT-O, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Blaivas' Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Blaivas, the exhibits that Dr. Blaivas may use to support his opinions, and Dr. Blaivas' qualifications, publications, testimonial history, and compensation. Plaintiffs hereby incorporate by reference Dr. Blaivas' Expert Reports and all subparts and attachments thereto.

- 3) Dr. Anne Wilson (FMEA)
QA Consulting, Inc.
7500 Rialto Blvd.
Bldg. 1, Ste. 225
Austin, Tx 78735
(512) 328-9404

Plaintiffs refer Defendants to Dr. Wilson's Expert Reports related to the TVT-O, and all subparts and attachments thereto which sets forth her opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Wilson's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Wilson, the exhibits that Dr. Wilson may use to support her opinions, and Dr. Wilson's qualifications, publications, testimonial history, and compensation. Plaintiffs hereby incorporate by reference Dr. Wilson's Expert Reports and all subparts and attachments thereto.

- 4) Dr. Scott Guelcher (Materials)
Polymer and Chemical Technologies, LLC
1008 Caldwell Avenue
Nashville, TN 37204
(615) 322-9097

Plaintiffs refer Defendants to Dr. Guelcher's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Guelcher's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Guelcher, the exhibits that Dr. Guelcher may use to support his opinions, and Dr. Guelcher's qualifications, publications, testimonial history, and compensation. Plaintiffs hereby incorporate by reference Dr. Guelcher's Expert Reports and all subparts and attachments thereto.

- 5) Dr. Bruce Rosenzweig (Urogynecologist)
Rush University Professional Building
1725 West Harrison Street, Suite 358
Chicago, IL 60612
(312) 942-6440

Plaintiffs refer Defendants to Dr. Rosenzweig's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Rosenzweig's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Rosenzweig, the exhibits that Dr. Rosenzweig may use to support his opinions, and Dr. Rosenzweig's qualifications, publications, testimonial history, and compensation. Plaintiffs hereby incorporate by reference Dr. Rosenzweig's Expert Reports and all subparts and attachments thereto.

Plaintiffs reserve the right to call any expert disclosed by any other party and thereafter deposed. Plaintiffs also reserve the right to call additional, undesignated expert witnesses as allowed by law and in particular, any of Plaintiffs' medical providers. Plaintiffs further reserve the right to supplement the above list should another party disclose experts in areas other than those covered by the above individuals.

Dated: January 17, 2017

/s/ Fidelma L. Fitzpatrick
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**CERTIFICATE OF SERVICE OF PLAINTIFFS' DESIGNATION AND DISCLOSURE
OF EXPERT WITNESSES**

I hereby certify that on January 17, 2017 I electronically served Plaintiffs' Designation and Disclosure of Expert Witnesses on counsel of record listed below.

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